

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address  DAVID SEROR - Bar No. 67488 JESSICA L. BAGDANOV – Bar No. 281020 BG LAW LLP 21650 Oxnard Street, Suite 500 Woodland Hills, CA 91367 Telephone: (818) 827-9000 Facsimile: (818) 827-9099 Email: dseror@bg.law jbagdanov@bg.law  <input type="checkbox"/> Individual appearing without attorney <input checked="" type="checkbox"/> Attorney for: Sam Leslie, Chapter 11 Trustee	FOR COURT USE ONLY
<b>UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION</b>	
In re:  COLDWATER DEVELOPMENT, LLC, A California limited liability company,   Debtor(s).	CASE NO.: 2:21-bk-10335-BB CHAPTER: 11          <b>APPLICATION FOR ORDER SETTING HEARING ON SHORTENED NOTICE [LBR 9075-1(b)]</b>

1. Movant applies under LBR 9075-1(b) for an order setting a hearing on shortened notice on the following motion:  
CHAPTER 11 TRUSTEE'S MOTION TO CLARIFY ORDER GRANTING CHAPTER 11 TRUSTEE'S MOTION FOR  
a. Title of motion: ORDER: APPROVING RETENTION OF THREESIXTY ASSET ADVISORS, LLC AND WFS INC. DBA TRANZON ASSET  
STRATEGIES AS AUCTIONEERS PURSUANT TO 11 U.S.C. § 327 AND APPROVING AUCTIONEER'S PROPOSED  
COSTS  
b. Date of filing of motion: 2/14/2022
2. Compliance with LBR 9075-1(b)(2)(A): (***The following three sections must be completed:***)
  - a. Briefly specify the relief requested in the motion:  
Through the Motion, the Trustee seeks clarification from the Court regarding the circumstances whereby secured creditor Give Back would be required to pay a buyer's premium. This motion is being filed after the Court held a hearing on the Trustee's motion to employ auctioneers.

b. Identify the parties affected by the relief requested in the motion:

(1) The Trustee for the Debtors' estates; (2) Give Back LLC

c. State the reasons necessitating a hearing on shortened time:

Shortened time for the hearing is necessary to enable the Trustee promptly seek approval of bid procedures to make the marketing and sale process as streamlined and efficient as possible. See the Declaration of David Seror attached to the Motion for the declaration justifying a hearing on shortened notice.

3. Compliance with LBR 9075-1(b)(2)(B): The attached declaration(s) justifies setting a hearing on shortened notice, and establishes a *prima facie* basis for the granting of the motion.
4. Movant has lodged a proposed Order Setting Hearing on Shortened Notice on mandatory form F 9075-1.1.ORDER .SHORT.NOTICE

Date: 2/14/2022

BG LAW LLP

Printed name of law firm

/s/ Jessica L. Bagdanov

Signature of individual Movant or attorney for Movant

Jessica L. Bagdanov

Printed name of individual Movant or attorney for Movant

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
21650 Oxnard Street, Suite 500, Woodland Hills, CA 91367

A true and correct copy of the foregoing document entitled: **APPLICATION FOR ORDER SETTING HEARING ON SHORTENED NOTICE [LBR 9075-1(b)]** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On *(date)* 02/14/2022, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On *(date)* 02/14/2022, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Honorable Sheri Bluebond  
United States Bankruptcy Court  
255 East Temple Street, Suite 1534  
Los Angeles, CA 90012-3332

☐ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on *(date)* \_\_\_\_\_, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

02/14/2022  
Date

NIKOLA A. FIELDS  
Printed Name

/s/ Nikola A. Fields  
Signature

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):

- **Jessica L Bagdanov** jbagdanov@bg.law, ecf@bg.law
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